

SAMUEL J. WELLBORN

DIRECT 803 231.7829 DIRECT FAX 803 231.7878

swellborn@robinsongray.com

Litigation + Business

March 19, 2019

VIA ELECTRONIC FILING & HAND DELIVERED CONFIDENTIAL VERSION

The Honorable Jocelyn G. Boyd Chief Clerk / Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, SC 29210

Re: Deborah Staggers v. Duke Energy Progress, LLC

Docket No. 2019-45-E

Dear Ms. Boyd:

Enclosed for filing, please find Duke Energy Progress, LLC's (the "Company") Motion to Dismiss the Complaint in the above-referenced docket. The Company requests that the filing deadlines for all parties and the hearing date continue to be held in abeyance pending resolution of this motion.

The Company also requests confidential treatment of Exhibits A and B to the motion, pursuant to S.C. Code Ann. Regs. 103-804(S)(2), as they contain confidential, customer-specific information.

By copy of this letter we are serving the Office of Regulatory Staff with the confidential version via hand delivery and Complainant with the same via U.S. Mail. Please feel free to contact me should you have any questions or concerns.

Kind regards,

Sam Wellborn

SJW:tch

Enclosures

cc w/enc: David Stark, Hearing Examiner (via email)

Deborah Staggers (via email and US Mail)

Jeffrey M. Nelson, Esquire (via email and hand delivery)

Becky Dover, Esquire-SC Dept of Consumer Affairs (via email)

Carri Grube-Lybarker, Esquire-SC Dept of Consumer Affairs (via email)

Heather Shirley Smith, Deputy General Counsel (via email) Rebecca J. Dulin, Associate General Counsel (via email)

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2019-45-E

Deborah Staggers,)
Complainants/Petitioners,)) CERTIFICATE OF SERVICE
v.)
Duke Energy Progress, LLC,)
Defendant/Respondent.)
)

This is to certify that I, Toni C. Hawkins, a paralegal with the law firm of Robinson Gray Stepp & Laffitte, LLC, have this day caused to be served upon the person(s) named below the **Motion to Dismiss on behalf of Duke Energy Progress, LLC** in the foregoing matter by placing copies of same in the U.S. Mail and/or hand delivery as follows:

Deborah Staggers 404 Charleston Avenue Lake City, SC 29560 heaviedee@hotmail.com

Jeffrey M. Nelson, Esquire Chief Legal Officer Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 jnelson@ors.sc.gov Becky Dover, Counsel SC Department of Consumer Affairs bdover@scconsumer.gov

Carri Grube-Lybarker, Counsel SC Department of Consumer Affairs clybarker@scconsumer.gov

Dated at Columbia, South Carolina this 19th day of March, 2019.

Doni C. Hawkins